

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

Case No.: 23-12142

APPLICATION FOR EMPLOYMENT OF COUNSEL AFFIDAVIT

Peter M. Daigle, an attorney, affirms and declares under penalty of perjury as follows:

1. I am an attorney with the law firm of The Law Office of Peter M. Daigle, which maintains offices for the practice of law at 1550 Falmouth Road, Suite 10, Centerville MA 02632.

2. I am admitted to practice before the Courts of the Commonwealth of Massachusetts, United States District Court for the District of Massachusetts, and the United States Court of Appeals for the First Circuit. I have previously represented debtors, secured and unsecured creditors, and other interested parties in all aspects of bankruptcy and commercial litigation proceedings, having practiced bankruptcy law, for approximately 20 years.

3. I submit this affidavit in support of the application of Bradlynn Corp. Inc. (the “Debtor”) to employ The Law Office of Peter M. Daigle as counsel to represent the Debtor in the within chapter 11 case. Neither I, nor The Law Office of Peter M. Daigle, nor any principal, or associate thereof, insofar as I have been able to ascertain after reasonable investigation, has any connection with the Debtor, other than as attorneys in this case, nor with its creditors, any other parties-in-interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

4. The Debtor desires to employ The Law Office of Peter M. Daigle under a general retainer because of the diverse legal services that are likely to be required. Subject to the approval of the Court, the Debtor has agreed to compensate The Law Office of Peter M. Daigle at its usual hourly rates and to reimburse The Law Office of Peter M. Daigle for its expenses, charges and disbursements.

5. Insofar as I have been able to ascertain, The Law Office of Peter M. Daigle and its attorneys are disinterested persons within the meaning of section 101(14) of the Bankruptcy Code, as modified by section 1107(b).

6. I have not agreed to share with any person (except members of my firm) the compensation to be paid for the services rendered in this case.

7. I have received a retainer in this case in the amount of \$5,000.00 plus the filing fee of \$1,738.00, which sum, upon information and belief, was generated by the Debtor from income recieved from running its business.

8. I shall amend this statement immediately upon my learning that (A) any of the within representations are incorrect or (B) there is any change of circumstance relating thereto.

9. I have reviewed the provisions of MLBR 2016-1.

10. The Law Office of Peter M. Daigle will not, while engaged in this case, undertake representation of any other entity in connection therewith.

11. Pursuant to 11 U.S.C. § 1195, notwithstanding the provisions of 11 U.S.C. § 327(a), neither I nor any member of my firms holds a claim against the debtor in excess of \$10,000 that arose prior to commencement of the case.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,



Peter M. Daigle, Esquire
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Dated: December 22, 2023